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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LARON ONEAL, individually,

Plaintiff,

vs.

ALBERTSON'S, LLC d/b/a
ALBERTSON'S; SAFEWAY INC. d/b/a
ALBERTSON'S; ALBERTSON'S STORES
SUB LLC; AB ACQUISITION LLC; DOES
1 through 100 and ROE CORPORATIONS 1
through 100, inclusive,

Defendants.

Case No.: 2:23-cv-00643-APG-MDC

**STIPULATION AND ORDER TO
MODIFY REPORT AND
RECOMMENDATION FINDING
DEFENDANT IN CONTEMPT FOR
FAILING TO COMPLY WITH THE
COURT'S ORDER And ORDER
GRANTING PLAINTIFF'S REQUEST
FOR AN EXTENSION OF TIME TO
TAKE DEPOSITIONS IN PART [EFC
NO. 96]**

Plaintiff Laron Oneal and the Albertson's Defendants, by and through their counsel of record, do hereby stipulate and agree to an extension of the deadlines set forth in the Court's Report and Recommendation Finding Defendant in Contempt for Failing to Comply With the Court's Order And Order Granting Plaintiff's Request for an Extension of Time to Take Depositions in Part, EFC No. 96, for the reasons set forth herein. The parties further set forth

that pursuant to LR 1A 6-1 and LR 26-3, this requested extension is sought based on good cause, and a written meet to address outstanding issues, during which the parties did agree, as set forth herein.

A. Reasons for Extension – LR 26-3(c)

The Court issued the above-referenced Report and Recommendation and Order, EFC No. 96, on July 11, 2025, setting forth deadlines. The parties seek to stipulate to extend the deadlines, for the reasons set forth. Plaintiff's counsel was in trial from July 7, 2025, through July 18, 2025, in the matter *Nguyen v. Endo*, Case No. A-20-826741-C, in Department 27 of the Eighth Judicial District Court. In addition, Plaintiff's counsel appeared before the Hon. Eric Johnson, in Department 20 of the Eighth Judicial District Court, on July 16, 2025, in the matter *Ortiz v. Restaurant Row Corner, LLC, et. al.*, Case No. A-22-850348-C, at which time Judge Johnson ordered that this matter proceed to trial before the court from August 11, 2025, through August 22, 2025. Finally, Plaintiff's counsel's son is getting married in Seattle, on Friday, September 5, 2025, requiring him to be in Seattle for family related activities prior to the wedding and for the wedding, from September 1, 2025, through September 7, 2025. As these dates already eroded a tight schedule for events, and as the future events further make difficult the ability to fully comply with the court's deadlines recommended and/or ordered, the parties do hereby stipulate to extend the deadlines set forth in ECF No. 96.

B. New Deadlines

	Current Deadline	New Deadline
Plaintiff filing Notice of Compliance of Service of Report and Recommendation, Order, and new subpoena for deposition of Shandana Mergerson	July 25, 2025	August 1, 2025
Service of topics for proposed topics for FRCP 30(b)(6) deposition of Defendants	July 25, 2025	August 1, 2025
Complete deposition of Defendants' FRCP 30(b)(6) witness(es)	August 18, 2025	September 29, 2025

1 The parties make this request for extension for compelling reasons and in good faith,
2 and after meeting and conferring in detail on the length of the extension, the reasons for the
3 extension, the additional discovery permitted, and not for any improper purpose.

4 WHEREFORE, the parties respectfully request that this Court extend the discovery
5 period from the current deadlines as outlined above.

6 DATED: July 25, 2025

7 /s/ Steven T. Jaffe

8 Steven T. Jaffe, Esq.

9 Hall Jaffe, LLP

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/s/ Jacquelyn Franco

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15 **ORDER**

16 **IT IS SO ORDERED.**

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20 UNITED STATES MAGISTRATE JUDGE

7-29-25
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